

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

*In re Flint Water Cases*

Case No. 5:16-cv-10444-JEL-EAS  
(*Consolidated*)

Hon. Judith E. Levy

Mag. Elizabeth A. Stafford

**DECLARATION OF PAUL F. NOVAK IN SUPPORT OF CLASS  
PLAINTIFFS' MOTION TO FURTHER SEAL PORTIONS OF  
ACCOMPANYING EXHIBITS 4 & 5 TO VEOLIA'S MOTION [ECF NO.  
2717] AND TO MAINTAIN THE SEAL OF PORTIONS OF VEOLIA'S  
MOTION [ECF NO. 2717] AND ACCOMPANYING EXHIBITS 2 & 3  
PURSUANT TO THIS COURT'S ORDER [ECF NO. 2723]**

I, Paul F. Novak, declare as follows:

1. I am the managing attorney of the Detroit office of the law firm Weitz & Luxenberg, P.C. ("WL"). My firm and I were Court-appointed to serve on Plaintiffs' Executive Committee for the Proposed Class, ECF No. 234, in the above captioned matter. I have personal knowledge of the matters stated in this Declaration.
2. Attached as **Exhibit A** is a true and correct public redacted copy of Exhibit 4 to Veolia's Motion to Exclude (ECF No. 2717-5), comprised of excerpts of the deposition transcript of Class Representative Rhonda Kelso.
3. Attached as **Exhibit B** is a true and correct unredacted copy of Exhibit

4 to Veolia's Motion to Exclude (ECF No. 2717-5), comprised of excerpts of the deposition transcript of Class Representative Rhonda Kelso, which has been filed under seal pursuant to LR 5.3(b)(3)(B)(iii) and this Paragraph 9 of this Court's Confidentiality Order (ECF No. 1255-3). The highlighting is to direct the Court to testimony referenced in Class Plaintiffs' motion that Class Plaintiffs have specifically identified for sealing.

4. Attached as **Exhibit C** is a true and correct public redacted copy of Exhibit 5 to Veolia's Motion to Exclude (ECF No. 2717-6), which is an email thread from July to August 2022 between counsel regarding the scheduling of non-party depositions.

5. Attached as **Exhibit D** is a true and correct unredacted copy of Exhibit 5, which has been filed under seal pursuant to LR5.3(b)(3)(B)(iii) and Paragraph 9 of this Court's Confidentiality Order (ECF No. 1255-3). The highlighting is to direct the Court to testimony referenced in Class Plaintiffs' motion that Class Plaintiffs have specifically identified for sealing.

I declare, under penalty of perjury , that the foregoing is true and correct.

Executed on December 14, 2023.  
Detroit, Michigan

/s/ Paul F. Novak  
Paul F. Novak